



---

west virginia department of environmental protection

---

Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304-2345  
Phone: 304 926 0475 • Fax: 304 926 0479

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

**MEMORANDUM**

**To:** Beverly McKeone  
**From:** William T. Rothwell II  
**Date:** September 22, 2016  
**Subject:** Warren Distribution, Inc. – Warren Northeast Facility – Marshall County, WV  
**ID #:** 051-00115  
**APP #:** PD16-045

**BACKGROUND INFORMATION:**

Warren Distribution, Inc. (Warren) operates an oil blending and distribution facility located in Glen Dale, Marshall County, WV. This facility has previously been granted six “no-permit needed” determinations (PD06-082, PD07-91, PD08-091, PD09-052, PD10-009, and PD10-064) as the source’s facility-wide emissions have not exceeded the threshold that would define the source as a “stationary source” under 45CSR13 (§45-13-2.24). Additionally, no emissions sources at the facility have knowingly triggered a substantive requirement in a state or federal air quality regulation. A brief description of each permit determination:

- On August 23, 2006, Warren received a no-permit-needed determination (PD06-082) from the DAQ regarding the original construction of this facility.
- On September 19, 2007, Warren again received no-permit-needed determination (PD07-091) from the DAQ for the construction of the facility. This determination was based on an updated equipment/process list of the facility.
- On January 7, 2009, Warren received no-permit-needed determination (PD08-091) from the DAQ for the addition of two 500,000 gallon storage tanks and a blowmolding machine.
- On August 31, 2009, Warren received no-permit-needed determination (PD08-091) from the DAQ for the addition of eight 30,000 gallon oil additive storage tanks.
- On February 16, 2010, Warren received no-permit-needed determination (PD10-009) from the DAQ for the addition of a new production line to fill six-gallon bags of motor oil using two filler heads.

- On September 28, 2010, Warren received no-permit-needed determination (PD10-064) from the DAQ for the worst-case emissions estimate determination.

The existing facility consists of 102 above-ground storage tanks. The tanks range in size from less than 5,000 gallons to 500,000 gallons. Most will contain heavy oil bases for the blending of motor oil. As such, they have very low vapor pressures that limit any VOC escape. The low vapor pressures of the base oils (all far below 3.5 kPa) exempt any of the tanks from 40 CFR 60, Subpart Kb applicability. Other additives also, according to Warren and the supplied MSDS, have vapor pressures below this applicability threshold.

Warren now intends to add 13 additional tanks ranging from 12,400 gallons to 21,400 gallons in volume containing the heavy oil bases to the oil blending and distribution facility.

The uncontrolled potential emissions for the tanks are as follows:

<u>Pollutant</u>	<u>Hourly PTE (LB/HR)</u>	<u>Yearly PTE (TON/YR)</u>
VOCs	0.0003	0.0014
HAPs	0.00003	0.0001

The emissions of the facility do not exceed the thresholds that would define the source as a "stationary source" under 45CSR13 (§45-13-2.24).

#### **RECOMMENDATION:**

The maximum facility-wide emission rates are below the emission limits of six (6) lb/hr and ten (10) TPY; 2 lb/hr, or 5 TPY of HAPs set forth set forth in 45CSR13 - 2.17.a&b, and the lack of the applicability of any substantive requirement of a State or Federal air quality regulation to the added equipment was determined. Therefore, a permit is not required by this Division for the above installation of the additional tanks.



William T. Rothwell II, P.E.  
Engineer

9/22/2016

Date